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BY ECF

Honorable Robert M. Levy  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *Government Employees Insurance Company, et al., v. Bruce Jacobson, et al., Index No. 15-cv-07236*; Response to Plaintiffs' Motion to Compel**

Dear Judge Levy:

We write on behalf of Defendants Bruce Jacobson, D.C., BMJ Chiropractic, P.C., NJ Pain Treatment, P.C., Jacobson Chiropractic, P.C., Dr. Bruce Jacobson DC, P.C., and NJ Neuro & Pain, P.C., ("GTPC Defendants") in response to Plaintiffs' motion to compel production of Defendants' tax returns and communications filed on 6/11/2018 at ECF No. 132.

The parties have conferred and GTPC Defendants have agreed to produce the documents and information sought by Plaintiffs in their motion at ECF No. 132 by Friday, June 22, 2018. The production will consist of allowing Plaintiffs' counsel to inspect a cellular phone containing text message communications between Dr. Jacobson and his employees and associates and/or, at Plaintiffs' option, a document reflecting the text of the messages, including the dates, times, and associated telephone numbers. GTPC Defendants have also agreed to provide authorizations to Plaintiffs to seek GTPC Defendants' tax returns for 2012 through 2015 from the Internal Revenue Service and the New York State Department of Taxation and Finance.<sup>1</sup> GTPC Defendants, in conference with Plaintiffs' counsel, believe that this agreement resolves the issues Plaintiffs have raised in their motion to compel.

Thank you for your consideration of this letter.

Respectfully,

/s/ \_\_\_\_\_

Nicholas Bowers, Esq.

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Cc: All Counsel via ECF

<sup>1</sup> Defendants' tax returns for 2016 and 2017 are subject to a separate motion to compel that GTPC Defendants already opposed. The Court has set a hearing on that motion for June 27, 2018. The parties have not resolved that motion.

